

REMARKS

Claims 20 – 38 are currently pending with claims 20 and 38 being independent. The Office Action indicates that claims 20 and 38 stand rejected under 35 U.S.C. §102(b) as being anticipated by the memo to Rosenberg entitled, "Supporting Intermediary Session Policies in SIP." In response, Applicants have amended claims 20 and 38 to better clarify the claimed invention over the cited art. As amended, Rosenberg does not anticipate claims 20 and 38.

The claimed invention provides a system and method for setting up calls across a plurality of packet-switched networks interconnected to each other by network address translation (NAT) devices. The system comprises a plurality of call agents that communicate signaling messages according to some well-known protocol such as the Session Initiation Protocol (SIP). Each call agent sends and receives these messages to and from other call agents. The messages carry information used to set up a call session, including address information for media packets within the packet-switched networks. The address information defines a media path of the call.

In conventional systems, calls that traverse multiple NAT devices lose information about a preceding network at each NAT device. Therefore, in cases where a call is routed back to a network segment that the call has already traversed, it is not possible to re-connect the call directly to that preceding network segment. With the claimed invention, however, at least one of the messages communicated between the call agents includes address information that was sent to a preceding call agent involved in the set-up of the call. More specifically, the call agents will, in some instances, "push" the address information (e.g., SIP session description information) of a preceding call agent that is involved in the call set-up onto a stack structure to become part of a multipart attachment to the message. However, in other situations, the call agents "pop" address information off of the stack. Whether a given call agent pushes (i.e., adds) or pops (i.e., deletes) address information from the message is based at least in part on a

set of predetermined rules consulted by the call agents. *E.g.*, *Spec.*, p. 5, ll. 14-18; p. 8 ln. 22 – p. 14, ln. 6; Figures 3-4.

To clarify this aspect of the claimed invention, claim 20 has been amended, without adding new matter, to recite that the call agents are configured to "modify the at least one message by adding address information to, and deleting address information from, the at least one message." Rosenberg does not disclose this limitation of claim 20, and therefore, does not anticipate claim 20.

Rosenberg discloses a system having a proxy server that interacts with a "middlebox" (i.e., a NAT) to open and close pinholes, obtain NAT bindings, and perform other functions. According to Rosenberg, the proxy will examine, and possibly modify, the session description information in the body of a SIP message to force a media packet to route through a selected intermediary device. *Rosenberg*, p. 3 ¶1. To accomplish this, Rosenberg discloses that the signaling messages carry Media Interface Objects (MIOs) and Media Filter Objects (MFOs). The MIOs describe a media aspect of the call session that is being set up by the caller, and are placed into the signaling message headers by the initiating User Agent (UA). The MFOs define the changes that a given proxy will apply to each MIO, and are also inserted into the signaling message headers by the proxies. *Rosenberg*, §4, pp. 6-8; Figures 1, 5.

Rosenberg adds MIOs and MFOs to a SIP INVITE messages to propagate them between proxies and to the destination U. However, there is no indication that Rosenberg deletes information from the SIP INVITE messages at any point along the line. In fact, Rosenberg teaches leaving the MFOs in the SIP INVITE message headers until they are received at the destination UA. *E.g.*, *Rosenberg*, p. 8, ¶6. With respect to the MIOs, Rosenberg explicitly discourages modification of the MIOs at the proxies. *E.g.*, *Rosenberg*, p. 7, ln. 14 – p. 8 ln. 5. Indeed, this does not disclose call agents configured to "modify the at least one message by adding address information to, and deleting address information from, the at

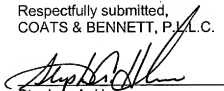
least one message." In fact, by prohibiting such deletion (and modification in general), Rosenberg teaches away from amended claim 20. Accordingly, Rosenberg does not anticipate claim 1 or any of its dependent claims.

The other independent claim (i.e., claim 38) is the corresponding method claim to claim 20. Applicant has amended claim 38 to include language similar to that of claim 20. Therefore, for reasons similar to those stated above, Rosenberg also fails to anticipate claim 38 or any of its dependent claims.

Finally, claims 21-37 stand rejected under 35 U.S.C. §103(a) as being obvious over Rosenberg in view of Harris (2004/0114590). However, each of these claims depends from claim 20, which is allowable over the cited art. Further, Harris does not remedy Rosenberg. Accordingly, claims 21-37 are also in condition for allowance.

In light of the foregoing amendments and remarks, all claims are allowable over the cited art. Applicant respectfully requests that the Office issue a Notice of Allowance for all pending claims.

Respectfully submitted,
COATS & BENNETT, P.L.L.C.



Stephen A. Herrera
Registration No.: 47,642

Dated: August 4, 2011

1400 Crescent Green, Suite 300
Cary, NC 27518

Telephone: (919) 854-1844
Facsimile: (919) 854-2084